



MANAGING PARTNERS
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December 16, 2022

BY ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Hon. Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re: New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)

This filing is related to:

Sierra v. City of New York, 20 Civ. 10291 (CM)(GWG), *consol. with*
Wood v. City of New York, 20 Civ. 10541 (CM) (GWG)

Your Honors:

As counsel for the Plaintiffs and putative class in the consolidated *Sierra-Wood* case, we write jointly with Defendants to inform the Court that the parties have reached a proposed settlement in principle on all claims, including claims for the proposed class in the *Sierra-Wood* case. As the Court is aware, this matter was brought as a putative class action. The proposed class consists of approximately 300 people arrested on East 136th Street between Brook Avenue and Brown Place during the June 4, 2020 demonstration in the Mott Haven neighborhood of the Bronx. The claims in this case are limited to monetary damages.

The parties have agreed to amounts for claims awards for putative class members and service awards for the named Plaintiffs, and to stay further discovery pending submission of a final settlement stipulation for the Court's approval. The parties also intend to separately resolve Plaintiffs' reasonable costs and attorneys' fees. To be clear, these settlement terms, and the agreed-upon stay of discovery, cover only the *Sierra-Wood* case.

The parties have significant work to do to finalize this class action settlement and are working together in good faith to complete these tasks. This include preparing a full stipulation of settlement, a motion for preliminary approval of the proposed settlement and certification of the



December 16, 2022
Page 2

class pursuant to Fed. R. Civ. P. 23(e), and proposed class notices and claim forms, among other things. Given the upcoming holidays and the tasks that remain to be completed, the parties respectfully request until February 28, 2023, to submit the motion along with proposed class settlement documents.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joshua S. Moskowitz'.

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cc: All Counsel of Record